

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CENTURY INDEMNITY COMPANY, as  
successor to Insurance Company of North  
America; ACE PROPERTY & CASUALTY  
INSURANCE COMPANY (f/k/a CIGNA  
Property & Casualty Insurance Company), as  
successor-in-interest to Central National  
Insurance Company of Omaha, but only as  
respects policies issued by it through  
Cravens, Dargan & Company, Pacific Coast;  
and PACIFIC EMPLOYERS INSURANCE  
COMPANY,

Plaintiffs,

v.

TRANSATLANTIC REINSURANCE  
COMPANY,

Defendant.

Civil Action No. 07-CV-10712 (VM) (ECF)

**NOTICE OF MOTION TO ADMIT  
PAUL ALP PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed affidavit of Paul Alp, sworn to on April 22, 2008, the Certificate of Good Standing annexed thereto, and the annexed affidavit of Frank M. Esposito, sworn to on April 23, 2008, we will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order admitting Paul Alp *pro hac vice* to argue or try this case in whole or in part as counsel for plaintiffs Century Indemnity Company, as successor to Insurance Company of North America; ACE Property & Casualty Insurance Company (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and Pacific Employers Insurance Company. There are no disciplinary proceedings pending against Paul Alp in any State or Federal Court.

APR 25 2008  
2008-04-25 2:55  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
FILED  
U.S. DISTRICT COURT  
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In accordance with Rule 2(B) of the Court's Individual Practice Rules, counsel to the parties have conferred with respect to the relief requested herein, and counsel to defendant consents to the admission *pro hac vice* of Paul Alp.

Dated: April 23, 2008

CROWELL & MORING LLP

By: 

Frank M. Esposito (FE2558)  
153 East 53rd St., 31st Floor  
New York, NY 10022  
(212) 223-4000  
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CENTURY INDEMNITY COMPANY, as successor to Insurance Company of North America; ACE PROPERTY & CASUALTY INSURANCE COMPANY (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and PACIFIC EMPLOYERS INSURANCE COMPANY.

## Plaintiffs,

V.

TRANSATLANTIC REINSURANCE  
COMPANY,

Defendant

State of New York )  
 )  
 County of New York )

FRANK M. ESPOSITO, being duly sworn, hereby deposes and says as follows:

1. I am a counsel with the firm Crowell & Moring LLP, attorneys for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Paul Alp as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in March, 1998. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Paul Alp since November 2007.

4. Paul Alp is a counsel with Crowell & Moring, in Washington D.C.

5. I have found Mr. Alp to be a skilled attorney and a person of integrity. He is experienced in Federal Practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Paul Alp, *pro hac vice*.

7. I respectfully submit a proposed order granting admission of Paul Alp, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Paul Alp, *pro hac vice*, to represent Plaintiffs in the above matter, be granted.

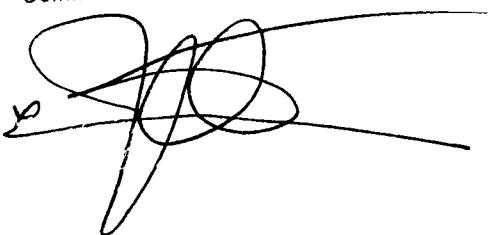
April 23, 2008  
New York, New York



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FRANK M. ESPOSITO

JOHN J. LUND  
Notary Public, State of New York  
No. 01LU6163687  
Qualified in New York County  
Commission Expires April 2, 2011



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SOUTHERN DISTRICT OF NEW YORK**

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Defendant.

Civil Action No. 07-CV-10712 (VM) (ECF)

**ADMISSION TO PRACTICE  
PRO HAC VICE**

The motion for the admission of Paul Alp to practice *pro hac vice* in the above captioned matter is granted. The admitted attorney, Paul Alp, is permitted to argue or try this particular matter in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms the appearance of Paul Alp as counsel to defendant in this case, and it will be entered on the Court's docket. A notation of his admission *pro hac vice* for the above listed case will be made on the roll of attorneys. In addition, he must register with Electronic Case Filing in this case.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Dated:

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United States District Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CENTURY INDEMNITY COMPANY, as  
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TRANSATLANTIC REINSURANCE  
COMPANY,

Defendant.

City Of Washington )  
                      )  
                      ) ss.:  
District Of Columbia )

Paul Alp, being duly sworn, hereby deposes and says as follows:

1. I am an attorney with the law firm of Crowell & Moring LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. I am a member in good standing of the District of Columbia Bar (Certificate of Good Standing attached hereto), the Maryland State Bar, and the Indiana State Bar.

4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this one case.



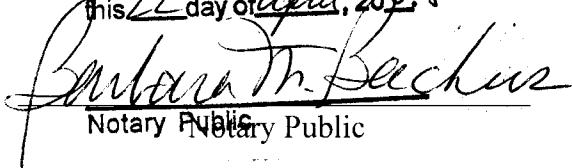
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Paul Alp  
Crowell & Moring LLP  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004  
[paulp@crowell.com](mailto:paulp@crowell.com)  
(202) 624-2500

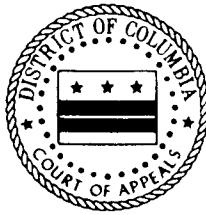
Dated: April 22, 2008

**DISTRICT OF COLUMBIA:**

Signed and sworn before me  
this 22 day of April, 2008

  
Barbara M. Backus  
Notary Public

Barbara M. Backus  
Notary Public, District of Columbia  
My Commission Expires 7/14/2012



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PAUL ALP

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was on the 7<sup>th</sup> day of DECEMBER, 1998

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 21, 2008.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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: Civil Action No. 07-CV-10712 (VM) (ECF)

**CERTIFICATE OF SERVICE**

I certify that on April 23, 2008, I caused true and correct copies of (a) the Notice of Motion to Admit Paul Alp *Pro Hac Vice*, (b) the Affidavit of Paul Alp, sworn to on April 22, 2008, and the Certificate of Good Standing annexed thereto, (c) the Affidavit of Frank M. Esposito, sworn to on April 23, 2008; and (d) a proposed Order granting Paul Alp admission *pro hac vice*, to be served upon (1) Mark A. Kreger, Esq., attorney for defendant, Locke Lord Bissell & Liddell, LLP, 111 South Wacker Drive, Chicago, Illinois 60606, by first class mail by

depositing same, enclosed in properly addressed and postage paid envelopes, in an official depository under the exclusive custody and control of the United States Postal Service located in New York, New York.

Dated: April 23, 2008

By:   
Frank M. Esposito (FE2558)  
CROWELL & MORING LLP  
Attorneys for Plaintiffs  
153 East 53rd St., 31st Floor  
New York, NY 10022  
(212) 223-4000  
[fesposito@crowell.com](mailto:fesposito@crowell.com)